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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

ROMAN ANDERSON, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

SUBARU OF AMERICA, INC., a New  
Jersey corporation; SUBARU CORP., a  
Japanese corporation; DENSO  
INTERNATIONAL AMERICA, INC.,  
a Delaware corporation; and DENSO  
CORP., a Japanese corporation,

Defendants.

CIVIL NO. 1:20-cv-00290-HG-WRP

**PLAINTIFF ROMAN  
ANDERSON'S NOTICE OF  
MOTION AND MOTION TO  
TRANSFER; MEMORANDUM IN  
SUPPORT OF PLAINTIFF  
ROMAN ANDERSON'S MOTION  
TO TRANSFER; DECLARATION  
OF TIMOTHY G. BLOOD IN  
SUPPORT OF PLAINTIFF  
ROMAN ANDERSON'S MOTION  
TO TRANSFER; CERTIFICATE  
OF SERVICE**

Hearing  
Date:  
Time:

Magistrate Judge Wes Reber Porter  
Trial Judge: Helen Gillmor  
Trial Date: Not Set

**JURY TRIAL DEMANDED**

**PLAINTIFF ROMAN ANDERSON’S  
NOTICE OF MOTION AND MOTION TO TRANSFER**

**PLEASE TAKE NOTICE THAT**, pursuant to 28 U.S.C. § 1404(a) and this Court’s inherent powers, Plaintiff Roman Anderson (“Plaintiff”) respectfully moves the Court for entry of an order transferring this case pursuant to 28 U.S.C. § 1404(a) to the Northern District of Alabama so that it may be consolidated with *Griffin, et al. v. Subaru of America, Inc. et al.*, No. 2:20-cv 00563-ACA (N.D. Ala.), the first-filed case. *Griffin* asserts claims arising from the same facts against the same defendants. Transfer is appropriate where all parties consent to the transfer, transfer is in the best interests of the parties and witnesses, and transfer will increase judicial efficiency.

Further, to effectuate the requested transfer should it be granted, Plaintiff Anderson, along with defendant Denso International America, Inc., requests that Denso International America, Inc. be granted until August 31, 2020 to answer or otherwise respond to Plaintiff’s complaint. This will avoid unnecessary litigation should this action be transferred.

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This Motion is supported by the accompanying Memorandum, the Declaration of Timothy G. Blood, Plaintiff's Request for Judicial Notice in support of the Motion, and all prior pleadings and proceedings in this action.

DATED: Honolulu, Hawaii, July 28, 2020.

/s/ Steven K. S. Chung

STEVEN K. S. CHUNG

TIMOTHY E. HO

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ROMAN ANDERSON